

## **REMARKS/ARGUMENTS**

### **Overview of the Office Action**

Claim 32 [sic] (Claim 23) has been objected to by the Examiner for an informality regarding the term “keybindings”.

Claims 1, 6, 7, 11, 14-15, and 21-22 have been rejected by the Examiner under 35 U.S.C. § 102(e) as being anticipated by Wugofski (U.S. Patent No. 6,317,143).

Claims 2-5, 8-10, 12-13, 16-20, and 23 have been rejected by the Examiner under 35 U.S.C. § 103(a) as unpatentable over Wugofski (U.S. Patent No. 6,317,143) in view of Buxton et al. (U.S. Patent No. 6,469,714).

### **Status of the Claims/Amendments**

Claims 9, 10, and 23 have been amended. Claims 1-23 are pending.

### **Explanation of Amendments to the Claims**

In regard to Claim 9, this claim has been amended to include the additional condition in the first limitation wherein “at least one command” of said invention “corresponds to at least one entry in a component table and a master table” of said invention. It is the intention of the Applicants to narrow this claim by clarifying and expressly adding this additional claim element for the sole purpose of avoiding the teachings of Wugofski (U.S. Patent No. 6,317,143) in view of Buxton et al. (U.S. Patent No. 6,469,714); however, Applicants in no way intend for this revision to, in any other way, limit the breadth and scope of this claim as originally stated and submitted.

In regard to Claim 10, the amendment to said claim has been made to correct an obvious error in the dependency cited therein and, as such, said change is in no way intended to change the scope and breadth of Claim 10.

In regard to Claim 23 and, specifically, to the amendment to the word “keybinding” (as discussed later herein), the Applicants note that the Examiner has cited no authority for his objection nor did the Examiner indicate that the original term, “keybindings,” to be in any way unclear. Therefore, Applicants respectfully submit that this particular amendment made to Claim 23 has been made solely at the suggestion of the Examiner for reasons that do not pertain to patentability and, as such, by making this amendment the Applicants in no way intend to change the scope and breadth of Claim 23.

In regard to the remaining amendments to Claim 23, these additional amendments have been made to claim only “computer-readable medium having store thereon one of a group comprising a component table and a master table, said one of said group comprising a data structure” having the characteristics and limitations listed therein as stated in the original claim. It is the intention of the Applicants to narrow this claim by clarifying and expressly adding this additional claim element for the sole purpose of avoiding the teachings of Wugofski (U.S. Patent No. 6,317,143) in view of Buxton et al. (U.S. Patent No. 6,469,714); however, Applicants in no way intend for this revision to, in any other way, limit the breadth and scope of this claim as originally stated and submitted.

### **Claim Objection**

Claim 32 [sic] (Claim 23) has been objected to by the Examiner for an informality regarding the term “keybindings”. In response, the Applicants have amended Claim 23 to

change both instances of “keybindings” to “key bindings” as suggested by the Examiner. In light of the amendment, Applicants respectfully request that his objection in regard to Claim 23 be withdrawn.

**Claims Rejected Under 35 U.S.C. § 102(e)**

Claims 1, 6, 7, 11, 14-15, and 21-22 have been rejected by the Examiner under 35 U.S.C. § 102(e) as being anticipated by Wugofski (U.S. Patent No. 6,317,143). However, in response, Applicants respectfully disagree with the Examiner’s conclusion that the invention of Wugofski includes each and every claim limitation present in Claims 1, 6, 7, 11, 14-15, and 21-22 of the present Application.

The invention of Wugofski is directed to a “method and apparatus for defining and redefining a dynamic graphical user interface” wherein “the graphical user interface determines the functionality of the newly added application” and “[e]xisting functions are used if they are equal to functions required of the new application...[and] New functionality is added if required.” (Wugofski, Abstract, lines 1-8). However, Wugofski nowhere discloses a unified user interface comprising one or more component tables and a master table as set forth in Claims 1, 6, 7, 11, 14-15, and 21-22 of the present Application.

As disclosed in the specification of the present Application, the master table contains a complete collection of all the commands for software components, and the master table is generated from the component table (page 11, lines 1-2). Each component table, in turn, is a data table for a particular component and contains the various commands available for the corresponding component and the desired location for the commands in the user interface (page 12, lines 1-3). Wugofski, on the other hand, does not disclose, suggest, or teach the use of tables

but, instead, discloses a method where the unified user interface is “redefined as different applications or applets are launched by receiving information from the applets or from software designed to retrieve functionality of the application or applets” (col. 2, lines 51-54).

In order to anticipate a claimed invention, a prior art reference must teach or suggest each and every element present in the claim. Wufgofski does not teach or suggest a unified user interface comprising one or more component tables and a master table, and thus fails to teach or suggest all the claim elements necessary to anticipate the present invention of Claims 1, 6, 7, 11, 14-15, and 21-22 under 35 U.S.C. § 102(e). Applicants therefore respectfully request that these rejections be withdrawn and that Claims 1, 6, 7, 11, 14-15, and 21-22 be allowed to issue.

**Claims Rejected Under 35 U.S.C. § 103(a)**

Claims 2-5, 8-10, 12-13, 16-20, and 23 have been rejected by the Examiner under 35 U.S.C. § 103(a) as unpatentable over Wugofski (U.S. Patent No. 6,317,143) in view of Buxton et al. (U.S. Patent No. 6,469,714). In response, Applicants have amended Claims 9 and 23 to clarify, for Claims 9-10, that a command corresponding to component of the suite application also corresponds to an entry in a component table and the master table and, for Claim 23, that the claimed data structure is an element of a component table or a master table.

In order to establish a prima facie case of obviousness, three basic criteria must be met. First there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second there must be a reasonable expectation of success. Finally the prior art reference (or references when combined) must teach or suggest all the claim elements. The teaching or suggestion to make the claimed combination and the reasonable

expectation of success must both be found in the prior art and cannot be based on applicant's disclosure. (MPEP §§ 2142, 2143.)

In regard to the third criteria (that the prior art references or combination of references must teach or suggest all the claim elements), Applicants respectfully submit that nowhere does Wugofski or Buxton, separately or in combination, teach or suggest all of the claim elements present in Claims 2-5, 8-10, 12-13, 16-20, and 23.

As discussed earlier herein, the invention of Wugofski is directed to a "method and apparatus for defining and redefining a dynamic graphical user interface" wherein "the graphical user interface determines the functionality of the newly added application" and "[e]xisting functions are used if they are equal to functions required of the new application...[and] [n]ew functionality is added if required." (Wugofski, Abstract, lines 1-8). Buxton, on the other hand, is directed to a "mechanism for generating customized graphical user interfaces for application in an object-oriented environment" wherein "[t]he graphic user interface comprises a visual user interface, e.g. an action bar which contain a set of buttons and menus as well as a set of widget and property/command panels, as well as a communication interface through which configuration and user responses are exchanged with the applications" and "the relationship between the graphic user interface and an applet is based on the applet communicating selection and user interface information to the graphic user interface, and the graphic user interface handling the user gestures by calling methods on specific interfaces of the applet" (Abstract, lines 1-14).

However, in regard to Claims 2-5, 8-10, 12-13, 16-20, and 23, neither Wugofski nor Buxton, alone or in combination, teaches or suggests a unified user interface comprising one or

more component tables and a master table. As previously discussed herein, the master table contains a complete collection of all the commands for software components, and the master table is generated from the component table (page 11, lines 1-2). Each component table, in turn, is a data table for a particular component and contains the various commands available for the corresponding component and the desired location for the commands in the user interface (page 12, lines 1-3). Neither Wugofski nor Buxton disclose, suggest, or teach the use of such structures.

Since Wugofski and Buxton fail to teach or suggest all the claim elements of the present invention described by Claims 2-5, 8-10, 12-13, 16-20, and 23 of the present Application, Applicants respectfully request that the rejection against these claims under 35 U.S.C. § 103(a) be withdrawn.

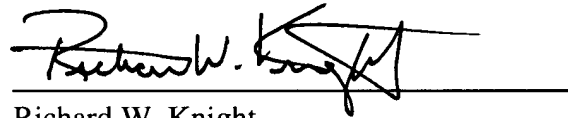
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**CONCLUSION**

Based on the reasons and rationale set forth herein, Applicants respectfully submit that the objections and rejections have been overcome and, accordingly, Applicants request that the objections and rejections be withdrawn and that the claims be allowed to issue. Should the Examiner have any questions, comments, or suggestions that would expedite the prosecution of the present case to allowance, Applicants' undersigned representative earnestly requests a telephone conference at (206) 332-1394.

Respectfully submitted,

Date: September 23, 2003

A handwritten signature in black ink, appearing to read "Richard W. Knight", is written over a horizontal line.

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